

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KATHLEEN DOUGLAS, an individual,

Plaintiff,

v.

EMPLOYBRIDGE, LLC, a California Limited
Liability Company; EMPLOYMENT
SOLUTIONS MANAGEMENT, INC., a
Georgia corporation; and DOES 1 through 10,
inclusive,

Defendants.

Case No. 2:18-cv-01215-JLR

STIPULATED MOTION TO
CONTINUE TRIAL UNTIL END OF
TRIAL CALENDAR AND EXTEND
ALL UNEXPIRED PRETRIAL
DEADLINES

Noted For Consideration:
October 8, 2019

Pursuant to Federal Rule of Civil Procedure 6(b), Local Civil Rule 16(b)(5), and the Court's Order dated October 1, 2019 (ECF No. 16), Defendants and Plaintiff (collectively, "the parties") hereby stipulate to and jointly request that the trial in the instant action be reset to the end of the Court's trial calendar and all pre-trial deadlines be adjusted accordingly. In support of this Motion, the parties state as follows:

1. Pursuant to the Court's November 27, 2018 Minute Order Setting Trial Date and Related Dates, trial for this matter is currently set for February 24, 2020. *See* ECF No. 8.
2. The parties wish to continue the trial date for the reasons set forth in their prior stipulated motions to continue trial. ECF Nos. 13, 15.

STIPULATED MOTION TO CONTINUE TRIAL & EXTEND
ALL UNEXPIRED PRETRIAL DEADLINES - 1
4839-0716-9449.1 089317.1040
2:18-CV-01215-JLR

LITTLER MENDELSON, P.C.
One Union Square
600 University Street, Suite 3200
Seattle, WA 98101.3122
206.623.3300

1 3. In its order dated October 1, 2019, the Court informed the parties that
2 “maintaining the current trial date or moving to the end of the Court’s trial calendar are the only
3 two options.” ECF No. 16. Accordingly, the parties wish to inform the Court of their desire to
4 move the trial in the instant action to the end of the Court’s trial calendar, and to reset all pretrial
5 deadlines which were unexpired as of the date of the parties’ first stipulated motion to continue
6 trial, including:

- 7 (a) The expert disclosure deadline;
8 (b) The discovery motions deadline;
9 (c) The discovery deadline;
10 (d) The dispositive motions deadline;
11 (e) The settlement conference deadline;
12 (f) The motions in limine deadline;
13 (g) The agreed pretrial order deadline;
14 (h) The deposition designation deadline
15 (i) The pretrial conference date; and
16 (j) The trial brief deadline.

17 For scheduling purposes, the parties and/or their counsel have conflicts on the following
18 week: February 1, 2021.

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STIPULATED MOTION TO CONTINUE TRIAL & EXTEND
ALL UNEXPIRED PRETRIAL DEADLINES - 2
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One Union Square
600 University Street, Suite 3200
Seattle, WA 98101.3122
206.623.3300

1 Dated: October 8, 2019

2
3 s/Kevin P. Smith

4 Kevin Smith, WSBA #48578
5 Defiance Law PLLC
6 1115 Tacoma Ave. S.
7 Tacoma, WA 98402
8 Tel: (253) 507-4769
9 k.smith@defiance.law

10 Attorneys for Plaintiff
11 ~~KATHLEEN DOUGLAS~~

s/ Kellie A. Tabor

Kellie A. Tabor, WSBA #46260
Ktabor@littler.com
M. Kathryne Bosbyshell, WSBA #47469
kbosbyshell@littler.com
LITTLER MENDELSON, P.C.
One Union Square
600 University Street, Suite 3200
Seattle, WA 98101.3122
Phone: 206.623.3300
Fax: 206.447.6965

Attorneys for Defendants
EMPLOYBRIDGE, LLC and
EMPLOYMENT SOLUTIONS
MANAGEMENT, INC.

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STIPULATED MOTION TO CONTINUE TRIAL & EXTEND
ALL UNEXPIRED PRETRIAL DEADLINES - 3
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CERTIFICATE OF SERVICE

I am a resident of the State of Washington. I am over the age of eighteen years and not a party to the within-entitled action. My business address is: One Union Square, 600 University Street, Suite 3200, Seattle, Washington 98101. I hereby certify that on October 8, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff

Kevin Smith
Defiance Law PLLC
1115 Tacoma Ave. S.
Tacoma, WA 98402
Tel: (253) 507-4769
k.smith@defiance.law
anastasia@defiance.law

I certify under penalty of perjury under the laws of the United States and of the State of Washington that the foregoing is true and correct.

Dated this 8th day of October, 2019.

s/ Karen Fiumano Yun

Karen Fiumano Yun
kfiumano@littler.com
LITTLER MENDELSON, P.C.

STIPULATED MOTION TO CONTINUE TRIAL & EXTEND
ALL UNEXPIRED PRETRIAL DEADLINES - 4
4839-0716-9449.1 089317.1040
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ORDER GRANTING STIPULATED
MOTION TO CONTINUE TRIAL
UNTIL END OF TRIAL CALENDAR
AND EXTEND ALL UNEXPIRED
PRETRIAL DEADLINES

This matter having come before the Court on the parties' Stipulated Motion to Continue Trial Until the End of the Court's Trial Calendar and Extend All Unexpired Pretrial Deadlines ("Stipulated Motion"), it is hereby **ORDERED** that the Stipulated Motion is **GRANTED**.

Dated this 8th day of October 2019.


THE HONORABLE JAMES L. ROBART

ORDER GRANTING STIPULATED MOTION TO CONTINUE TRIAL
& EXTEND ALL UNEXPIRED PRETRIAL DEADLINES - 1

4826-1447-2361.1 089317.1040

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Seattle, WA 98101.3122
206.623.3300